

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

FELONY

**INDICTMENT FOR CONSPIRACY
TO COMMIT WIRE FRAUD AND WIRE FRAUD**

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
PIERRE EMMANUEL JALLA	*	VIOLATIONS: 18 U.S.C. § 371
a/k/a Marco		18 U.S.C. § 1343
JACKSON NTONE NDEMBA	*	18 U.S.C. § 2
a/k/a Ndemba Ntone Jackson	*	
a/k/a Ndemba Jackson	*	
a/k/a Sammy Jackson	*	
	* * *	

The Grand Jury charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. **PIERRE EMMANUEL JALLA, a/k/a Marco** (hereafter referred to as "JALLA"), was a native of the Republic of Cameroon illegally present in the United States.
2. **JACKSON NTONE NDEMBA, a/k/a Ndemba Ntone Jackson, a/k/a Ndemba Jackson, a/k/a Sammy Jackson** (hereafter referred to as "NDEMBA") was a native of the Republic of Cameroon illegally present in the United States.

3. Defendant **JALLA** subscribed to and utilized T-Mobile cellular telephone number 770-906-4655, said number originating in Georgia, to communicate with an undercover Federal Bureau of Investigation (hereafter referred to as "FBI") agent in New Orleans, Louisiana.

B. THE CONSPIRACY:

From a time unknown, but prior to July 28, 2009, through on or about July 29, 2009, in the Eastern District of Louisiana and elsewhere, the defendants, **PIERRE EMMANUEL JALLA, a/k/a Marco** and **JACKSON NTONE NDEMBA, a/k/a Ndemba Ntone Jackson, a/k/a Ndemba Jackson, ak/a Sammy Jackson**, combined, conspired, confederated, and agreed with each other to engage in a scheme to defraud, that is, to obtain money, by means of false and fraudulent pretenses, representations, and promises, and in the execution of said scheme the defendants knowingly transmitted and caused to be transmitted in interstate commerce, wire communications, that is communications by telephone and cellular phone, in furtherance of and for the purpose of executing the scheme to defraud, in violation of Title 18, United States Code, Section 1343.

C. THE SCHEME:

JALLA and **NDEMBA** solicited \$60,000 in United States currency from an undercover FBI agent, and in return agreed to produce \$120,000 in counterfeit United States currency, when in truth and in fact, defendants intended to steal the \$60,000 in United States currency provided by an FBI agent.

D. OVERT ACTS:

In furtherance of and to effect the objectives of the conspiracy and scheme to defraud, and to accomplish its purposes and objectives, the defendants committed and caused to be committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. On or about July 28, 2009, **JALLA** entered into an agreement with an undercover FBI agent to accept \$60,000 in United States currency and in return would produce \$120,000 in counterfeit United States currency.
2. On or about July 29, 2009, **JALLA** and **NDEMBA** knowingly transmitted and caused to be transmitted in interstate commerce, wire communications, that is communications by cellular telephone, specifically cellular telephone number 770-906-4655, said number originating in Georgia, to communicate with an undercover FBI agent in New Orleans, Louisiana.
3. On or about July 29, 2009, **JALLA** and **NDEMBA** met an undercover FBI agent for the purpose of taking possession of the key to a hotel room to be used in furtherance of defendants' alleged counterfeiting operation.

4. On or about July 29, 2009, **JALLA** and **NDEMBA** possessed materials used in the production of counterfeit currency, including dyes and white paper precut to the size of United States currency, and approximately \$61,700 of counterfeit United States currency.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

From a time unknown, but prior to July 28, 2009, through on or about July 29, 2009, in the Eastern District of Louisiana and elsewhere, the defendants, **PIERRE EMMANUEL JALLA, a/k/a Marco** and **JACKSON NTONE NDEMBA, a/k/a Ndemba Ntone Jackson, a/k/a Ndemba Jackson, a/k/a Sammy Jackson**, did willfully, and intentionally engage in a scheme to defraud, that is, to obtain money, by means of false and fraudulent pretenses, representations, and promises, and in the execution of said scheme the defendants knowingly transmitted and caused to be transmitted in interstate commerce, wire communications, that is


communications by telephone and cellular phone, in furtherance of and for the purpose of executing the scheme to defraud; all in violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL:

FOREPERSON



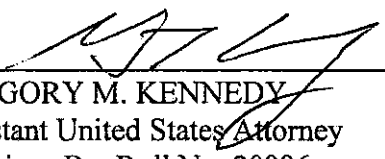
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New Orleans, Louisiana
August 6, 2009